

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

<b>IN RE:</b>	)	
<b>PEDRO LUIS SANTIAGO</b>	)	<b>CASE NO. 17-14589-PMM</b>
<b>MELENDEZ</b>	)	<b>CHAPTER 13</b>
	)	
<b>DEBTOR</b>	)	

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND  
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING  
PROPERTY DESCRIBED AS 1416 CHURCH STREET, READING, PA 19601 AND  
THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN NUMBER  
\*\*\*\*\*1374**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a secured creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon  
Brock and Scott, PLLC  
Attorneys at Law  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
pabkr@brockandscott.com

Freedom Mortgage  
10500 Kincaid Drive  
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-06096 BKMFR01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon  
Attorney at Law (203993)  
Brock & Scott, PLLC  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
844-856-6646 x4560  
704-369-0760  
pabkr@brockandscott.com

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Notice of Appearance has been electronically served or mailed, postage prepaid on August 11, 2021 to the following:

PEDRO LUIS SANTIAGO MELENDEZ  
1416 CHURCH ST  
READING, PA 19601-1232

Mendelsohn & Mendelsohn, PC  
Mendelsohn & Mendelsohn, PC  
637 Walnut St  
Reading, PA 19601  
tobykmendelsohn@comcast.net

Scott F. Waterman, Bankruptcy Trustee  
Chapter 13 Trustee  
2901 St. Lawrence Ave, Suite 100  
Reading, PA 19606

United States Trustee, US Trustee  
200 Chestnut Street  
Suite 502  
Philadelphia, PA 19106

/s/ Mario Hanyon  
Mario Hanyon  
Attorney at Law (203993)  
Brock & Scott, PLLC  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
844-856-6646 x4560  
704-369-0760  
pabkr@brockandscott.com